

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Joseph Rushin
(Plaintiff)

Civil Case NO. 1:25-CV-581
DFB

vs.

Joe Wolff
Eugene Eiden
Lackawanna County
Probation Officers
(Defendants)

FILED
HARRISBURG, PA

APR 01 2025

PER [Signature]
DEPUTY CLERK

COMPLAINT

1) Plaintiff Joseph Rushin a citizen of County of Lackawanna state of Pennsylvania residing at 1371 N. Washington Ave Scranton, PA 18509 wishes to file a complaint under Civil rights violations 440/550.

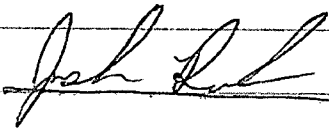
2) The Defendants Joe Wolff + Eugene Eiden of Lackawanna County state of Pennsylvania. The defendants work at 130 N. Washington Ave. Scranton, PA 18503 + are Lackawanna Probation Officers.

3) STATEMENT OF CLAIM: The defendants are Lackawanna probation officers + violated my civil rights as follows 1) A Guilty plea was entered + I was not present on March 6, 2025 nor did I enter this plea. This is procedural due process violation of the 14th + 5th Amendment of the United States Constitution which is cruel + unusual punishment which is also a violation of the 8th amendment + 2). The defendants are refusing to credit my time of these charges, which I have credited 4/14/22-4/22/22, 5/19/22-6/17/22, 9/22/22-10/3/22, 10/17/22-2/13/23, 1/12/24-2/14/24, 2/11/24-3/15/24, 11/24/24-current. I also have 6/17/22-7/17/22 at Pyramid Rehab in Belleville, PA + 2/13/23-10/16/23 at the Salvation Army in Scranton, PA which totals upto 616 days. They exploited my addiction by giving me trumped up charges that don't fit + I suffer from Substance abuse disorder. I had no intention of distributing anything. So this is slander as written on documents with my name in them, I have a disease that I suffer greatly from. The 14th amendment equal protection clause provides meaningful consideration to all of the statutory factors + consider any properly presented sentencing argument which has colorable legal merit + a factual Basis.

Procedural reasonableness of a statement under abuse of discretion standard. A defendant must bring a procedural error to the district court's attention at the time of the error is made. *US v. Flores-Mejia*, 759 (3rd Cir 2014).

At this time I'm suffering from these constitutional violations which is a total miscarriage of justice causing me mental anguish due to deliberate indifference."

4). WHERE FOR, The plaintiff Joseph Rushin prays that this honorable district Court for the United States grants relief that this honorable court deems, just + proper.



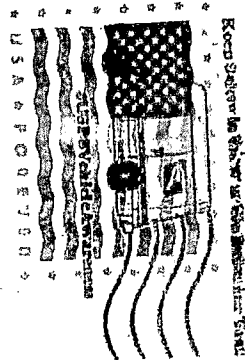
1371 N. Washington Ave
Scranton, PA 18509

Joseph Rushin

Lackawanna County Prison
NAME Joseph Rushin
BOOKING# 2024-03346
P.O. BOX 247
Phoenix MD 21131

LEHIGH VALLEY PA 180

27 MAR 2025 PM 4 L



Peter J. Welsh

1501 N. 6th St.

Suite 101

Harrisburg, PA 17102

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